

REMARKS

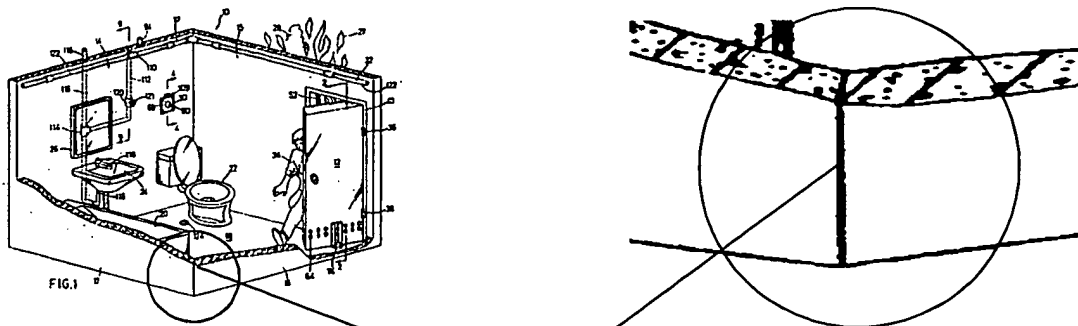
Claims 27-29 have been canceled. New claims 30-32 remain pending. In a communication dated April 2, 2001, the Examining Attorney stated the following:

As seen by the record, Hsu teaches the vault having integral walls, a roof, and a floor, a door and frame within one of the walls, and Trice teaches the use of only one opening. Applicant is reminded that the Guardiani reference teaches a vault having a seamless room having walls, a roof, and a floor. Therefore, the examiner contends that he claimed invention is not allowable over the prior art of record.

It is submitted that the new claims 30-32 are distinguishable over the prior art of record in that none of the prior art references teach a seamless structure unitarily formed as a single piece and defining a front wall having a door frame opening therethrough, a rear wall, two side walls, a roof and a floor. Hsu, Trice and Guardiani, alone or in combination, fail to teach disclose or even suggest the seamless structure as claimed by Applicant.

The Examining Attorney suggests that "the walls, floor, and roof can be molded separately and then integrally connected via a mechanical connection." *See Office Action, February 16, 2001.* However, newly added Claims 30-32 clarify that Applicant's invention relates to a seamless structure unitarily formed as a single piece, rather than a structure molded separately and then integrally connected via a mechanical connection. According to Websters, seamless means "having no seams." *See MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY*, p. 1053 (10th Ed. 1995) (copy provided). None of the cited references provide a structure with a housing body having no seams.

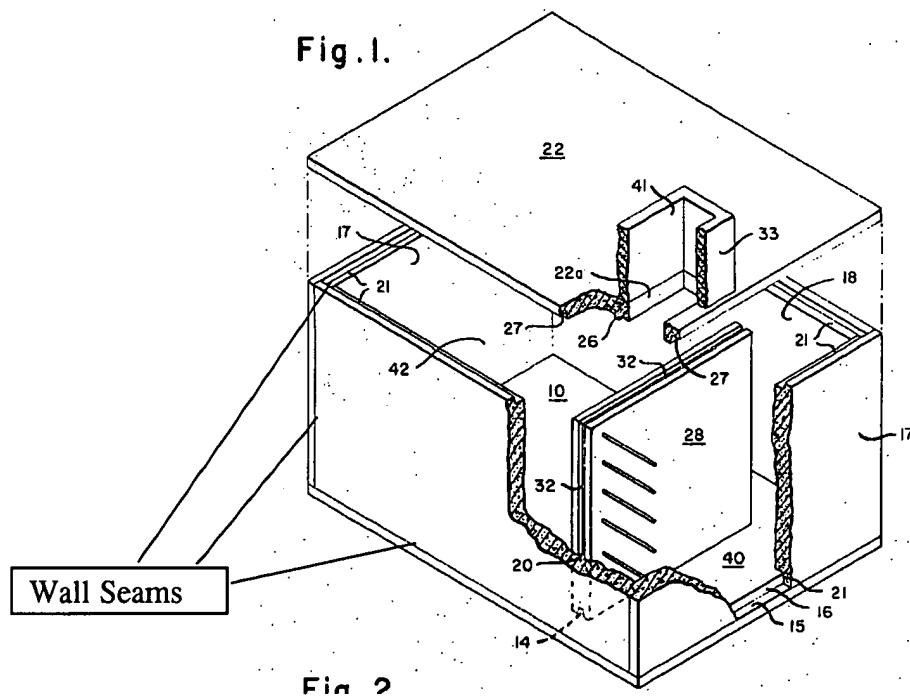
As seen below, Hsu's drawings show that there are seams in the structure where the walls are joined:



Hsu Figure 1

Wall Seam

As shown below in Figure 1, Trice also teaches away from a seamless structure by disclosing a structure that has seams where the walls are assembled or joined:



Wall Seams

Guardiani also fails to teach a seamless structure. In fact, as stated by the Examiner, Guardiiani teaches away from a seamless structure by disclosing "a modular vault comprising...a

pre-cast roof slab, see Figure 4, pre-cast side and end walls (12a), and a pre-cast floor slab, see Figure 6, and a door opening." *Office Action mailed February 25, 2000.* Additionally, as indicated in virtually every claim mentioning the prefabricated modules (or rooms), Guardiani's modules have **interconnecting** surfaces. *See Col. 7, Ll. 48; Col. 8, Ll. 5; Col. 8, Ll. 36; Col. 8, Ll. 54; and Col. 9, Ll. 36.* Interconnect, from the root word connect, means to become joined. *See* DICTIONARY, p. 244 (copy provided). Naturally, where the slabs join along their mated edges, a seam is formed. *See* DICTIONARY, p. 1053 (seam means "a line, groove, or ridge formed by the abutment of edges") (copy provided). Thus, Guardiani does not teach a seamless structure as disclosed by Applicant.

In view of the above, none of the cited references, alone or in combination, provide Applicants' claimed invention. Applicant, therefore, requests allowance of these claims. If an interview by telephone would promote the furtherance of this application, please contact the undersigned.

Attached hereto is a marked up version of the changes made to the claims by the current amendment. The attached page is captioned "**Replacement Pages.**"

A request for extension of time is filed contemporaneously herewith.

The filing fee for this submission is enclosed herewith. However, should there be any additional fees required, please charge such additional fees to deposit account No. 10-0447, reference (41241.00006USD1).

Respectfully submitted,

4/18/01

Margaret A. Boulware

Margaret A. Boulware
Registration No. 28,708

Jenkins & Gilchrist, P.C.
1100 Louisiana
Suite 1800
Houston, Texas 77002
Telephone: (713) 951-3300
Telecopier: (713) 951-3314

REPLACEMENT PAGES

Please cancel claims 27-29.

Please add the following claims:

31. A modular vault comprising:

a seamless housing body unitarily formed as a single piece, said seamless housing body having portions defining a front wall having a door frame opening therethrough, a rear wall, two side walls, a roof and a floor; and
a door mountable in the door frame opening such that said vault is fire-resistant and burglary proof.

31. A modular vault of claim 30 wherein a plurality of hooks are integrally formed into the cast housing body for facilitating hoisting the cast housing body.

32. A modular vault of claim 30 wherein there are more than two side walls.